

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN HUGO EICKHOFF, JR.,
RHONDA KAYE EICKHOFF,
HOFFMAN ASSOCIATES, LLC,
ARIC ELLIOT SCHREINER,
COLUMBIA CPA GROUP LLC,
JOHN WILLIAM GRAY II, and
DAMON THOMAS EISMA, individually
and d/b/a DAMON T. EISMA
ATTORNEY AT LAW,

Defendants.

Case No. 2:22-cv-04027-MDH

DISCOVERY STATUS REPORT

As required by the Court's Scheduling and Trial Order for Bench Trial (Doc. No. 80), the United States, Aric Schreiner, and Columbia CPA Group, LLC jointly provide following status report¹:

By the United States

Since filing the prior Discovery Status Reports in this action (Doc. Nos. 91 and 111), the United States completed discovery and received responses to the Government's written discovery served prior to March 1, 2023, as follows:

¹ The Court entered injunctions and judgments resolving the United States' claims in this action against Defendants John Eickhoff, Jr., Hoffman Associates, LLC, Rhonda Eickhoff, Damon Eisma, and John Gray, II.

	Description	Date	Status
	U.S. 3 rd Requests for Production to Columbia CPA Group, LLC		Responses received on 3/30/23 to discovery served prior to 3/1/23.
	U.S. 2 nd Set of Interrogatories to Aric Schreiner		Responses received on 3/30/23 to discovery served prior to 3/1/23.
	U.S. 1 st Set of Interrogatories to Columbia CPA Group, LLC		Responses received on 3/30/23 to discovery served prior to 3/1/23.
73	U.S. 3 rd Set of Interrogatories to John Eickhoff, Jr.	Served on 3/2/23	Withdrawn following entry of injunction and judgment against John Eickhoff, Jr.
74	U.S. 2 nd Set of Interrogatories to Rhonda Eickhoff	Served on 3/2/23	Withdrawn following entry of injunction and judgment against Rhonda Eickhoff
75	U.S. 2 nd Set of Interrogatories to Hoffman Associates, LLC	Served on 3/2/23	Withdrawn following entry of injunction and judgment against Hoffman Associates, LLC
76	U.S. 2 nd Set of Interrogatories to Columbia CPA Group, LLC	Served on 3/31/23	Responses Received
77	Deposition of Alan Hook (non-party)	4/27/23	Completed.
78	Deposition of David Dukes (non-party)	4/28/23	Completed.
79	Deposition of Harvey Mundt (non-party)	5/8/23	Completed.
80	Deposition of Thomas Skattum (non-party)	5/15/23	Completed.
81	Rule 30(b)(6) Deposition of Willow Creek Wealth Management	5/31/23	Completed

82	Deposition of Neal Katz (non-party)	5/31/23	Completed
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Since the discovery status reports filed with the Court on December 1, 2022 and March 1, 2023 (*i.e.*, Doc. Nos. 91 and 111), the United States received additional document productions from Defendants in this action in response to the United States' document requests either noted above or in prior discovery status reports. The United States produced documents to Defendants Rhonda Eickhoff, Aric Schreiner, and Columbia CPA Group, LLC in response to their requests for production noted below. Depositions of the following non-party witnesses are scheduled: (a) Donald Furrer and Tim Gerhardt (June 2, 2023); (b) Richard Rodgers (June 7, 2023); (c) David Moore (June 8, 2023); and Paul Beere (June 20, 2023). The United States may serve discovery on additional non-parties and Defendants. The United States is coordinating with counsel for Defendants to reach agreed-upon dates for additional depositions. There are currently no discovery disputes among the parties.

By Rhonda Eickhoff

(On May 23, 2023, the Court entered an injunction and judgment against Rhonda Eickhoff resolving the United States' claims against her in this action.)

	Description	Date	Status
1	Rhonda Eickhoff's First Request for Production to the United States	Served on 2/21/2023	Responses served.
2	Rhonda Eickhoff's First Set of Interrogatories to the United States	Served on 2/21/2023	Responses served.

By Aric Schreiner and Columbia CPA Group

	Description	Date	Status
1	Aric Schreiner's First Request for Production to the United States	Served on 3/28/2023	Responses served.
2	Aric Schreiner's First Set of Interrogatories to the United States	Served on 3/28/2023	Responses served.

Dated: June 1, 2023

Respectfully submitted,

TERESA A. MOORE
United States Attorney

DAVID A. HUBBERT
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/s/ Russell J. Edelstein
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